

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 21cr10173
)	
v.)	Violations:
)	
ANDRE TILAHUN,)	<u>Count One:</u> Receipt of Child Pornography
)	(18 U.S.C. § 2252A(a)(2)(A))
)	
Defendant)	<u>Count Two:</u> Possession of Child Pornography
)	(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))
)	
)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Receipt of Child Pornography
(18 U.S.C. § 2252A(a)(2)(A))

The Grand Jury charges:

Between on or about May 15, 2020 and August 15, 2020, in the District of Massachusetts,
the defendant,

ANDRE TILAHUN,

knowingly received, and attempted to receive, any child pornography, as defined in Title 18,
United States Code, Section 2256(8), that had been mailed, and using any means and facility of
interstate and foreign commerce shipped and transported in and affecting interstate and foreign
commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWO

Possession of Child Pornography
(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

The Grand Jury further charges:

On or about April 20, 2021, in the District of Massachusetts, the defendant,

ANDRE TILAHUN,

knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

CHILD PORNOGRAPHY FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2252A, set forth in Counts One and Two, the defendant,

ANDRE TILAHUN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. Said property includes, without limitation:

- a. iPhone X, serial number G0QVW0U5JCLF, seized on or about April 20, 2021;
- b. MacBook Pro, serial number C02J57MNDKQ1, seized on or about April 20, 2021.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


BENJAMIN A. SALTZMAN
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JUNE 1, 2021
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo
DEPUTY CLERK
at 3:55 PM
6/1/21

